

FEDERAL COMMUNICATIONS COMMISSION
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December 18, 2018

Cumulus Licensing LLC
3280 Peachtree Road, NW
Suite 2200
Atlanta, GA 30305

Re: Cumulus Licensing LLC
WHBT(AM), Tallahassee, FL
Facility Identification Number: 28162
Special Temporary Authority

Dear Applicant:

This is in reference to the request filed December 11, 2018, on behalf of Cumulus Licensing LLC ("CLL"). CLL requests special temporary authority ("STA") to operate station WHBT(AM) from an alternate site location with emergency antenna facilities.¹

In support of the request, CLL states that WHBT(AM) has lost the lease at its licensed site. Coupled with the on-going repairs of an old transmitter, it has now become necessary to seek a temporary alternative. Therefore, the station requests STA to operate with a long-wire antenna from the station's studio location.

Specifically, WHBT(AM) requests STA to operate from its studio site with a 50.3 meter (165 foot) horizontal long-wire antenna that will be supported on one end by an existing buried wooden pole and attached on the other end to a tower structure that supports the STL antenna at the studio site. The STA request is for daytime only operation with a reduced power of 0.030 kW.

STA requests which involve a change in transmitter site must include four critical elements: (1) Loss of the licensed site must be beyond the licensee's control; (2) STA facilities must continue to provide service to the licensed community; (3) STA facilities must maintain, as closely as practicable, the licensed service area² without extending it; (4) STA facilities cannot involve the construction of towers intended for permanent use by the station requesting the STA.

Our review indicates that the proposed STA operation complies with the foregoing criteria.

¹ WHBT(AM) is licensed for operation on 1410 kHz with a daytime power of 5 kilowatts and a nighttime power of 0.018 kilowatt, employing a non-directional antenna pattern (ND1-U).

² For AM - 0.5 mV/m contour; for FM - 1.0 mV/m contour.

Accordingly, the request for STA is GRANTED. Station WHBT(AM) may operate with the following facilities:

Geographic coordinates	30° 27' 47" N, 84° 21' 28" W (NAD 1927)
Frequency	1410 KHz
Hours of operation	Daytime only
Operating power	0.030 kW (daytime)
Antenna type	50.3 meter (165 foot) horizontal long-wire antenna
Antenna Efficiency	Not to exceed 214.8 mV/m/kW

It will be necessary to further reduce power or cease operation if complaints of interference are received. WHBT(AM) must notify the Commission when licensed operation is restored. WHBT(AM) must use whatever means are necessary to protect workers and the public from exposure to radio frequency radiation in excess of the Commission's exposure guidelines. *See* 47 CFR § 1.1310.

This authority expires on **June 16, 2019**.

STA Advisory: Section 309(f) of the Communications Act of 1934, as amended, authorizes the Commission to grant STA in cases of "extraordinary circumstances requiring temporary authorizations in the public interest and when delay in the institution of the temporary operations would seriously prejudice the public interest." However, Section 309(f) is not a means by which a licensee/permittee may circumvent established processing procedures which require the filing of an application, nor is it a means by which a broadcaster may enhance his facility or make operation more convenient for the broadcaster. Stations operating with less than licensed facilities under temporary authorities can be viewed as receiving the benefit of a larger protection area than that in which they are currently providing service.

Accordingly, Special Temporary Authorities by nature are to be temporary and are not intended for extended use. Licensees of stations operating under temporary authorities are reminded that timely restoration of permanent facilities is the responsibility of the licensee and should be undertaken expeditiously. Any request for extension of special temporary authorities carries an increased burden with each subsequent request.

Therefore, requests for extension of STA will be granted only where the licensee can show that one or more of the following criteria have been met:

- Restoration of licensed facilities is complete and testing is underway;
- Substantial progress has been made during the most recent STA period toward restoration of licensed operation; or

- No progress has been made during the most recent STA period for reasons clearly beyond the licensee's control, and the licensee has taken all possible steps to expeditiously resolve the problem.

Sincerely,

A handwritten signature in dark ink, reading "Jerome J. Manarchuck". The signature is fluid and cursive, with the first name "Jerome" and last name "Manarchuck" clearly legible.

Jerome J. Manarchuck
Audio Division
Media Bureau

cc: Andrew S. Kersting, Esq. (via email only)